

TARA CAPPS, as administrator
Of The Estate of MARK CAPPS,

Plaintiff,

vs.

METROPOLITAN GOVERNMENT
OF NASHVILLE-DAVIDSON
COUNTY, TENNESSEE,

And

ASHLEY COON,

Defendants.

)
)
) **Case No. 3:23-cv-1141**
)
) **Judge Crenshaw**
)
) **Magistrate Judge Newbern**
)
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) **JURY DEMAND**
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Comes now the Plaintiff, by and through Counsel, and moves this Honorable Court pursuant to Fed. R. Civ. P. 15 to permit the filing of the attached **Third Amended Complaint**. *See Sims v. Atrium Med. Corp.*, 349 F. Supp. 3d 628 (W.D. Ky. 2018). Plaintiff submits the attached memorandum of law, proposed amended complaint, and supporting exhibits in connection with her motion to amend.

Counsels for Plaintiff have discussed this request for Counsels for Defendants, who indicate that Defendants oppose this motion.

Respectfully submitted,

s/ Kyle Mothershead

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CERTIFICATE OF SERVICE

I hereby certify that on **March 20, 2025**, the Plaintiff's **Motion to Amend Complaint** was filed electronically with the Court's electronic filing system. Notice of this filing will be electronically served by operation of the Court's electronic filing system on **Melissa Roberge and Will Ayers, Counsels for Defendants**, at melissa.roberge@nashville.gov, and Will.Ayers@nashville.gov, and **Bryan Moseley**, co-counsel for Plaintiff, at bryan.moseley@moseleylawfirm.com.

s/ Kyle Mothershead

Kyle Mothershead, BPR 22953